

Douglas R. Ricks, OSB #044026
VANDEN BOS & CHAPMAN, LLP
319 SW Washington St., Ste. 520
Portland, OR 97204
Telephone: 503-241-4869
Fax: 503-241-3731

Of Attorneys for Sunshine Dairy Foods Management, LLC
Debtor-in-Possession

Nicholas J. Henderson, OSB #074027
nhenderson@portlaw.com
MOTSCHENBACHER & BLATTNER, LLP
117 SW Taylor St., Suite 300
Portland, OR 97204
Telephone: (503) 417-0508
Facsimile: (503) 417-0528

Of Attorneys for Karamanos Holdings, Inc.,
Debtor-in-Possession

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON

In re

Sunshine Dairy Foods Management, LLC
and
Karamanos Holdings, Inc.,

Debtors-in-Possession.

Bankruptcy Case Nos.

18-31644-pcm11 (Lead Case)
18-31646-pcm11

MOTION TO EXTEND TIME TO
FILE APPLICATION TO EMPLOY
REAL ESTATE BROKER

Debtor-in-Possession, Sunshine Dairy Foods Management, LLC moves the Court for an Order extending the deadline of June 15, 2018 by which Debtors must file their Application to Employ Real Estate Broker through and including Monday, June 18, 2018.

This extension is necessary because Debtors, as well as their counsel, need additional time to prepare the application to employ real estate broker, the Rule 2014

Statement in support of the same, and for Debtors and their counsel to receive, review and approve a form of listing agreement with their selected real estate broker.

Debtors have selected CBRE Group, Inc. as the real estate broker for the West Plant property. That selection was made on Thursday, June 14, 2018 and the decision relayed to First Business Capital Corporation (“FBCC”) on that same day. Debtor’s counsel was notified today, June 15, 2018, by counsel for FBCC that there was no objection to the selection of CBRE Group, Inc. as the real estate broker. After receiving FBCC’s consent to the selection of the CBRE Group, Inc., Debtor’s counsel prepared the necessary Application for employment and provided the necessary materials to CBRE Group, Inc. to complete the Rule 2014 Statement. As of the filing of this Motion, Debtor’s counsel has not yet received CBRE Group, Inc.’s proposed form of listing agreement or completed Rule 2014 Statement. Debtor’s counsel attempted to reach counsel for FBCC by telephone and email to obtain consent to the requested extension without the need to file the instant motion.

VANDEN BOS & CHAPMAN, LLP

By:/s/Douglas R. Ricks
Douglas R. Ricks, OSB #044026
Of Attorneys for Debtor-in-Possession

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON

In re

Sunshine Dairy Foods Management, LLC,
and
Karamanos Holdings, Inc.

Debtors-in-Possession.

Bankruptcy Case Nos:

Case No. 18-31644-pcm11 (Lead Case)
Case No. 18-31646-pcm11

PROPOSED ORDER GRANTING
EXTENSION OF TIME FOR DEBTORS
TO FILE APPLICATION TO EMPLOY
REAL ESTATE BROKER

Based on Debtor-in-Possession's, Sunshine Dairy Foods Management, LLC
("Debtor"), Motion to Extend Time to File Application to Employ Real Estate Broker
("Motion), and the Court being otherwise fully advised, it is

ORDERED that Debtor's Motion is granted and Debtors shall have through and
including Monday, June 18, 2018 to file the Application to Employ Real Estate Broker and
Rule 2014 Verified Statement for Proposed Professional.

###

I certify that I have complied with the requirements of LBR 9021-1(a)(2)(A).

PRESENTED BY:

VANDEN BOS & CHAPMAN, LLP

By:/s/Douglas R. Ricks

Douglas R. Ricks, OSB #044026
Of Attorneys for Debtors-in-Possession

First Class Mail:

Sunshine Dairy Foods Management, LLC
Attn: Norman Davidson, III
801 NE 21st Ave.
Portland, OR 97232

Karamanos Holdings, Inc.
Attn: Norman Davidson, III
801 NE 21st Ave.
Portland, OR 97232

Valley Falls Farm, LLC
c/o Bryan P. Coluccio, V.P. and
General Counsel Keystone-Pacific, LLC
18555 SW Teton Avenue
Tualatin, OR 97062
(Un. Sec. Cred. Comm. Chairperson)

Sorrento Lactalis, Inc.
c/o Phillips Lytle LLP
Attn: Angela Z. Miller
125 Main Street
Buffalo, NY 14203

Electronic Mail:

The foregoing was served on all CM/ECF participants through the Court's Case Management/Electronic Case File system.

In re Sunshine Dairy Foods Management, LLC
Ch 11 Bankruptcy Case No. 18-31644-pcm11(Lead Case)
In re Karamanos Holdings, Inc.;
Ch 11 Bankruptcy Case No. 18-31646-pcm11

CERTIFICATE - TRUE COPY

DATE: June 15, 2018

DOCUMENT: MOTION TO EXTEND TIME TO FILE APPLICATION TO EMPLOY
REAL ESTATE BROKER and PROPOSED ORDER GRANTING
EXTENSION OF TIME FOR DEBTORS TO FILE APPLICATION TO
EMPLOY REAL ESTATE BROKER

I hereby certify that I prepared the foregoing copy of the foregoing named document and have carefully compared the same with the original thereof and it is a correct copy therefrom and of the whole thereof.

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing on:

Sunshine Dairy Foods Management, LLC Attn: Norman Davidson, III 801 NE 21st Ave. Portland, OR 97232	Valley Falls Farm, LLC c/o Bryan P. Coluccio, V.P. and General Counsel Keystone-Pacific, LLC 18555 SW Teton Avenue Tualatin, OR 97062 (Un. Sec. Cred. Comm. Chairperson)	Sorrento Lactalis, Inc. c/o Phillips Lytle LLP Attn: Angela Z. Miller 125 Main Street Buffalo, NY 14203
Karamanos Holdings, Inc. Attn: Norman Davidson, III 801 NE 21st Ave. Portland, OR 97232		

by mailing a copy of the above-named document to each of them in a sealed envelope, addressed to each of them at his or her last known address. Said envelopes were deposited in the Post Office at Portland, Oregon, on the above date, postage prepaid.

I hereby certify that the foregoing was served on all CM/ECF participants through the Court's Case Management/Electronic Case File system on the date set forth below.

Dated: June 15, 2018

VANDEN BOS & CHAPMAN, LLP

By:s/Douglas R. Ricks
Douglas R. Ricks, OSB #044026
Of Attorneys for Debtors-in-Possession